

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA)	
)	
)	No. 14-CR-468
v.)	
)	Honorable Harry D. Leinenweber
BEAU B. BRINDLEY and)	U.S. District Judge
MICHAEL THOMPSON)	

**PETITION FOR ORDER GRANTING IMMUNITY PURSUANT TO
SECTION 6002, TITLE 18, UNITED STATES CODE,
TO COMPEL TESTIMONY OF WITNESS**

The UNITED STATES OF AMERICA, by LORETTA E. LYNCH, United States Attorney General, JAMES L. SANTELLE, United States Attorney for the Eastern District of Wisconsin, and Assistant U.S. Attorneys Michael Chmelar and Mel Johnson, state as follows:

1. The above-captioned case is scheduled for trial, beginning on August 17, 2015.
2. The government will seek testimony and evidence from Karilyn Jorgensen Wilcox at that trial.
3. Karilyn Jorgensen Wilcox, through her attorney Jayne Ingles, has indicated that if she is subpoenaed to testify at that trial, she will assert her privilege against self-incrimination under the Fifth Amendment to the United States Constitution.
4. It is my judgment as United States Attorney for the Eastern District of Wisconsin that the testimony and evidence of Karilyn Jorgensen Wilcox in the proceedings before the Court are necessary to the public interest.
5. Therefore, I have sought and obtained approval from the designated representative of the Attorney General of the United States to make application to this Court that Karilyn

Jorgensen Wilcox be instructed by the Court to testify and produce evidence in the proceedings before the Court in the above-captioned matter; all in accordance with the terms and provisions of Title 18, United States Code, Sections 6002 and 6003. A copy of a letter from the Assistant Attorney General of the Criminal Division, United States Department of Justice, setting out the above-mentioned approval, is attached to this petition.

WHEREFORE, the United States requests that the Court enter an Order instructing Karilyn Jorgensen Wilcox to testify and produce evidence in the in the above captioned case, subject to the provisions of 18 U.S.C. § 6002, namely, that no testimony or other information compelled under the Order (or any information directly or indirectly derived from such testimony or other information) may be used against her in any criminal case, except a prosecution for perjury, giving a false statement, or otherwise failing to comply with the Order.

Respectfully submitted,

LORETTA E. LYNCH
United States Attorney General

/s/James L. Santelle
JAMES L. SANTELLE
United States Attorney
Eastern District of Wisconsin

/s/Michael Chmelar
Michael Chmelar
Assistant United States Attorney
Eastern District of Wisconsin
517 East Wisconsin
Milwaukee, Wisconsin 53202
(414) 297-1728

Date: July 24, 2015



U.S. Department of Justice

Criminal Division

Office of the Assistant Attorney General

Washington, D.C. 20530

SEP - 8 2014

The Honorable James L. Santelle
United States Attorney
Eastern District of Wisconsin
530 Federal Building
517 East Wisconsin Avenue
Milwaukee, Wisconsin 53202

Attention: Michael Chmelar
Assistant United States Attorney

Re: *In Re: Matter Before Grand Jury 13 GJ 870*

Dear Mr. Santelle:

Pursuant to the authority vested in me by 18 U.S.C. § 6003(b) and 28 C.F.R. § 0.175(a), I hereby authorize you to apply to the United States District Court for the Northern District of Illinois for an order, pursuant to 18 U.S.C. §§ 6002-6003, requiring Kari Wilcox to give testimony or provide other information in the above matter and in any further proceedings resulting therefrom or ancillary thereto, provided that such individual refuses to testify or provide information on the basis of the privilege against self-incrimination.

Sincerely,

Leslie R. Caldwell
Assistant Attorney General
Criminal Division


PAUL M. O'BRIEN
DEPUTY ASSISTANT ATTORNEY GENERAL
CRIMINAL DIVISION